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March 21, 2008

Luly Massaro, Clerk
Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

Re: RI Energy Efficiency and Resource Management Council's Proposed Standards for
Energy Efficiency and Conservation Procurement and System Reliability
Docket No. 3931

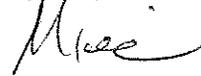
Dear Luly:

This office represents Bluewater Wind LLC.

Enclosed are an original and nine copies of Bluewater Wind LLC's Motion to Intervene in
Docket No. 3931.

If you have any questions, please feel free to call.

Very truly yours,



Michael R. McElroy

MRMc:tmg
3931-Massaro
cc: Service List

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2008 MAR 24 AM 10:15
PUBLIC UTILITIES COMMISSION

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: RI ENERGY EFFICIENCY AND RESOURCE :
MANAGEMENT COUNCIL'S PROPOSED :
STANDARDS FOR ENERGY EFFICIENCY : DOCKET No. 3931
AND CONSERVATION PROCUREMENT AND :
SYSTEM RELIABILITY :

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PUBLIC UTILITIES COMMISSION

MOTION OF BLUEWATER WIND LLC
TO INTERVENE AS A FULL PARTY

Now comes Bluewater Wind LLC, by its undersigned counsel, and pursuant to Rule 1.13 of the Rules of Practice and Procedure of the Public Utilities Commission (Commission), hereby moves to intervene as a full party in this matter.

The Division of Public Utilities and Carriers (Division), through its counsel, has stated that it has no objection to the granting of this motion.

1. Bluewater Wind LLC is a developer of wind energy projects across the country and is committed to clean, stable-priced, renewable electricity.

2. Bluewater Wind LLC hopes to develop an Rhode Island offshore wind farm and therefore has a special interest in this docket, which deals with (among other matters) standards for system reliability, including the use of renewable energy services like wind.

3. Bluewater Wind LLC is interested in exploring in this docket, among other things, activities and commitments to increase renewable energy production and contracting and how those activities affect costs, benefits, price stability, fuel diversity, and environmental goals.

4. Because the production of electricity through offshore wind farms is a unique issue to Bluewater Wind LLC and there are no other wind energy project developers to our

knowledge participating in this docket, Bluewater Wind LLC believes that its participation as a full party intervenor in this docket is appropriate because its interests would not otherwise be adequately represented.

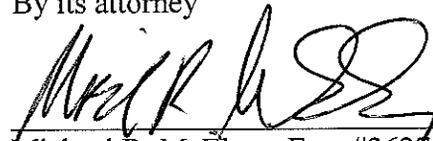
5. Commission Rule 1.13 provides in pertinent part that “any person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate may intervene in any proceeding before the Commission.” The Rule goes on to further state that such a right or an interest may be:

“an interest which may be directly affected and which is not adequately represented by existing parties and as to which movants may be bound by the Commission’s action in the proceeding.”

6. Rule 1.13 also provides that such right or interest may be “any other interest of such nature that movant’s participation may be in the public interest.”

Accordingly, Bluewater Wind LLC, pursuant to Rule 1.13, hereby moves for intervention as a full party in this matter.

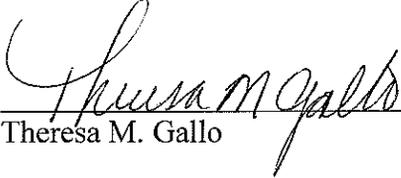
Respectfully submitted,
Bluewater Wind LLC
By its attorney

 3/21/08
Michael R. McElroy, Esq. #2627

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CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of March, 2008, I mailed a true copy of the foregoing by first class mail to the service list in this docket.



Theresa M. Gallo